

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
	)	
v.	)	CRIMINAL NO. 04-10384-PBS
	)	
	)	
DANIEL KAMEN,	)	
Defendant	)	

**GOVERNMENT'S PROPOSED VOIR DIRE QUESTIONS**

The United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Paul R. Moore, hereby respectfully submits the following proposed voir dire questions for the upcoming trial in the above-captioned matter:

1. This case involves charges of receipt of images depicting minors engaging in sexually explicit conduct. Would that fact prevent any member of the jury from rendering a fair and impartial verdict? Federal law prohibits receiving, transmitting, and possessing images of minors engaging in sexually explicit conduct. Does any member of the jury feel that such laws should not be enforced at all, enforced more vigorously than other laws, or enforced less vigorously than other laws? Does any member of the jury believe that such activity should be protected by the First Amendment to the United States Constitution or by any other provision of the Constitution?
2. Does any member of the jury have any opinions, religious beliefs, philosophies, or prejudices that would make you unable to come to a verdict in this case? For example, does any member of the jury believe that no person should ever be judged or convicted? Does any member of the jury believe that a person is guilty just because they are here in court?
3. This case was investigated by the United States Postal Inspection Service. Is there anything about your attitude to this law enforcement agency that would prevent any member of the jury from fairly and impartially evaluating the evidence and rendering a fair and impartial verdict?
4. Has any member of the jury or any members of your family been involved in the criminal justice system as a defendant in a criminal case? If so, would your experience as a criminal defendant, or as the family member of a criminal defendant, render you unable

to be fair and impartial juror in this case?

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Paul R. Moore  
Paul R. Moore  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorneys for defendant, on June 29, 2006, by electronic filing.

By: /s/ Paul R. Moore  
Paul R. Moore  
Assistant United States Attorney